

CHRIS T. RASMUSSEN, ESQ.
Nevada Bar. No. 7149
RASMUSSEN & KANG, LLC.
330 South Third Suite 1010
Las Vegas, NV 89101
(702) 464-6007
chris@rasmussenkang.com
Counsel for Peter Santilli

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PETER T. SANTILLI,

Defendant,

CASE NO. 2:16-CR-00046-GMN-PAL

**REPLY TO GOVERNMENT'S RESPONSE TO SANTILLI'S MOTION FOR JOINDER
TO RYAN PAYNE'S MOTION TO DISMISS DK 305**

Defendant PETER T. SANTILLI, by and through his counsel Chris T. Rasmussen, Esq. submits the following Reply to Government's Response to Santilli's Motion for Joinder to Motion DK 305.

Dated this 11th day of May, 2016

Respectfully Submitted,

RASMUSSEN & KANG, LLC.

/s/ Chris T. Rasmussen

Chris T. Rasmussen, Esq.

MEMORANDUM OF POINTS AND AUTHORITIES

Peter Santilli has been charged for his speech as a radio talk show host and his presence at two different locations within the United States. Santilli was first arrested in the State of Oregon for his presence at a protest that took place at the Malheur Wildlife Refuge. Shortly after his arrest, an Indictment in this case was unsealed and he was transported to Las Vegas, Nevada for an initial hearing. There are currently two cases that are being simultaneously prosecuted by the Department of Justice against Santilli.

Santilli's arguments are identical to Payne's. Both are being prosecuted in Nevada and Oregon. Both are in custody. There is no difference in the difficulty of the defense of these two as they are both having to investigate charges in two separate districts simultaneously.

Santilli will be away from Nevada for an extended period of time that will diminish the attorney client relationship.

Conclusion

We ask this Court allow for Santilli's Joinder to Payne's Motion to Dismiss as the legal arguments and their factual circumstances are identical.

Dated this 11 of May, 2016.

Respectfully Submitted,
RASMUSSEN & KANG, LLC.
/s/ Chris T. Rasmussen

Chris T. Rasmussen, Esq.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28